

RECEIVED

NOV 17 2022

BY MAIL

UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF MISSOURI

DIVISION

Sammy Lee Casey-EL,  
WALTER Tolbert  
Gwen Thompson

(Write the full name of each plaintiff  
who is filing this complaint. If the  
names of all the plaintiffs cannot fit in  
the space above, please write "see  
attached" in the space and attach an  
additional page with the full list of  
names.)

v. CITY OF ST. LOUIS DEPARTMENT  
OF PUBLIC SAFETY, CIVILIAN OVER-  
SIGHT BOARD, Louise Cylles,  
ANTOINE MAY,  
ET AL

(Write the full name of each defendant.  
The caption must include the names of  
all of the parties. Fed. R. Civ. P. 10(a).  
Merely listing one party and writing "et  
al." is insufficient. Attach additional  
sheets if necessary.)

**Complaint for a Civil Case**

Case No.

(to be assigned by Clerk of  
District Court)

Plaintiff requests trial by jury:

Yes  No

28 U.S.C. 1331, 1343 et seq.  
Declaratory Judgment Seeking  
Immediate INJUNCTIVE RELIEF,  
MONETARY DAMAGES, NOMINAL &  
PUNITIVE ETC. Court Order  
IMMEDIATE MEDIATION FOR  
SETTLEMENT. PAYMENT FOR PARALEGAL  
FEES, COURT COST ETC. WHATEVER  
THE COURT DEEM JUST AND  
APPROPRIATE. Rule 23 F.R.C.P.  
ALL ~~Defendants~~ Are ON SOCIAL  
SECURITY INCOME. CERTIFIED AS A  
CLASS ACTION. PLEASE, FOR ALL PLAINTIFFS

**CIVIL COMPLAINT**

**NOTICE:**

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date, the full name of a person known to be a minor, or a complete financial account number. A filing may include only: the last four digits of a social security number, the year of an individual's birth, a minor's initials, and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed without prepaying fees or costs.

**I. The Parties to This Complaint**

**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Sammy Lee Casey -EL,  
WALTER Tolbert,  
Gwen Thompson -4726 Lexington  
Name Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address

4726 Lexington Ave  
St. Louis  
Missouri 63115  
314-361-9217 - Sammy,  
WALTER Tolbert 314-243-  
4812.

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1  
Name  
Job or Title  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address

Louise Lyles,  
ANTOINE MAY,  
INVESTIGATOR CIVILIAN OVERSIGHT BOARD  
1520 MARKET ST. RM 4029  
ST. LOUIS MO  
MISSOURI 63103  
314-657-1606

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant. If you are suing for violation of your civil rights, you must state whether you are suing each defendant in an official capacity, individual capacity, or both.)*

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only three types of cases can be heard in federal court. Provide the information for this case. *(Include all information that applies to your case)*

### A. Federal question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

42 U.S.C. 1983,  
28 U.S.C. 1331, 1343 et. seq.  
4th Amendment of U.S. Constitution: Denial  
of due process and to the Equal Protection of  
the law, substance due process violation

### B. Suit against the Federal Government, a federal official, or federal agency

List the federal officials or federal agencies involved, if any.

### C. Diversity of Citizenship

These are cases in which a citizen of one State sues a citizen of another State or nation, and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

#### 1. The Plaintiff(s)

The plaintiff, (name) \_\_\_\_\_, is a citizen of the  
State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

2. The Defendant(s)

If the defendant is an individual

The defendant, (name) Louisa Cyles, et al, is a citizen of the State of (name) Missouri Or is a citizen of (foreign nation) \_\_\_\_\_.

If the defendant is a corporation

The defendant, (name) \_\_\_\_\_.

is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of

business in the State of (name) \_\_\_\_\_ Or

is incorporated under the laws of the State of (foreign nation) \_\_\_\_\_, and has its principal place

of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy---the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake---is more than \$75,000, not counting interest and costs of court, because (explain):

### III. Statement of Claim

Type, or neatly print, a short and plain statement of the FACTS that support your claim(s). For every defendant you have named in this complaint, you must state what he or she personally did to harm you. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Do not make legal arguments, or cite court cases or statutes. You may attach additional pages if necessary.

Your statement of claim must include all of the following information:

1. What happened to you?
2. When did it happen?
3. Where did it happen?
4. What injuries did you suffer?
5. What did each defendant personally do, or fail to do, to harm you?

ON July 4, 2021 OFFicer Humphrey AND Patton While ACTING INDIVIDUALLY IN AN OFFICIAL CAPACITY under the Color oLAW Deprived US OUR RIGHTS THAT Are Secured To US Under the CONSTITUTION & LAWS OF THE U.S. We Were illegally Pulled over For STOP et., ON July 19, 2021 We All GOT TOGETHER AND FILE A COMPLAINT AGAINST OFFICERS. We Were ALL ASSIGNED "Louisa Lyles", WHO NEVER CONTACTED US CONCERNING THE INVESTIGATIONS OF OUR ALLEGATIONS AGAINST BOTH OFFICERS. ON July 20, 2021 We Received COB-21-0068, "Louisa Lyles" and "Antoine May" Both While ACTING INDIVIDUALLY IN AN OFFICIAL CAPACITY Deprived US OF OUR RIGHTS AS IS Secured To US Under the CONSTITUTION LAWS OF THE UNITED STATES, WHEN THEY BOTH FAILED Under the DUE PROCESS & EQUAL PROTECTION CLAUSE TO THE LEGAL ENTITLEMENT TO OUR LIBERTY INTEREST TO HAVE THIS MATTER INVESTIGATED, mediated AND WE NEVER ULTIMATELY RECEIVED THE COB FINDINGS, IN WHICH SHE SAID THAT WE "WILL" b.. FINDINGS. NOT ONE OF US RECEIVED THEIR FINDINGS. THEY BOTH WERE ACTING INDIVIDUALLY IN A OFFICIAL CAPACITY, under the Color LAW WHEN THEY DEPRIVED US OF THIS ENTITLEMENT, TO OUR PROPERTY AND LIBERTY INTEREST, TO THEIR FINDINGS.

### IV. Relief

State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments.

1. Declare That Louisa Lyles & Antoine May FAILED ITS INVESTIGATION CONCERNING OFFICERS MISCONDUCT.
2. Declare That ONE OR BOTH DEFENDANTS FAILED TO INSURE US AND OR FAILED TO ~~ENFORCE~~ ITS ON POLICY THAT GRANTS US DUE PROCESS PROTECTION TO BEING ENTITLE TO RECEIVED THE BOARD FINDINGS.
- 5 PUNITIVE DAMAGES \$120,000, ONE HUNDRED TWENTY THOUSAND.

ENFORCE

Do you claim the wrongs alleged in your complaint are continuing to occur now?

Yes  No

Do you claim actual damages for the acts alleged in your complaint?

Yes  No

Do you claim punitive monetary damages?

Yes  No

If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.

*Nominal, I Feels My Name has been disrepected AS A CITIZEN OF This County, Being entitled The The SAME Due Process AND EQUAL Protection OF The LAW. PUNITIVE DAMAGES For FAILURE TO INVESTIGATE, AS She Said, They had AN INJUNCTION File AGAINST Them. I Told her my COMPLAINT Should been INVESTIGATED AND THAT THE INJUNCTION WAS EX POST FACTO. Sept 21, 2021  
My COMPLAINT WAS July 19, 2021.*

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 12 day of November, 2022.

Signature of Plaintiff(s)

*Danny Lee Casey El*

*Walter Tolles*

*Stephanie P. Tolles*